

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANNA CHIMANSKI, et., al.,

Case No. 17-CV-4306

Plaintiff

vs.

HON. AMY J. STEVE

FRONTIER AIRLINES INC

Defendant

**PLAINTIFF'S INITIAL DISCLOSURES
PURSUANT TO FEDERAL RULE 26(a)(1)**

NOW COMES the above-named Plaintiffs by and through their attorneys, Gorokhovsky Law Office LLC, provides the following Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. Plaintiff's Initial Disclosures are based upon information available to them so far. Plaintiffs are reserving their right to supplement and amend its disclosures as discovery continues.

- A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

RESPONSE:

1. All named plaintiffs
c/o Vladimir Gorokhovsky of Gorokhovsky Law Office LLC
Subject: details of delayed and cancelled flight No. 81 operated by Frontier on December 19, 2016; efforts made by Frontier Airlines to accommodate Plaintiffs; Plaintiffs' actions following delays and cancellations of defendant's flights; damages allegedly sustained by Plaintiffs related to delays and cancellations; actions taken by Frontier Airlines regarding alleged delays and cancellations.
2. Frontier's Employees;
Latifah A. Ali, Senior Claims Adjuster Allianz Global Corporate & Specialty
c/o Atty. Brian Maye

Subject: Frontier Airlines policies and procedures; delays and cancellations details; Frontier Airlines response to cause of subject delays and cancellations; actions taken by Frontier Airlines in response to delays and cancellations.

4. Plaintiffs' Employers and co-workers
Subject: Plaintiffs' alleged loss of wages
5. Witnesses identified by Plaintiffs
6. Witnesses identified by Defendant

Any Plaintiff's employers and or agents identified herein or otherwise referenced in any document described herein or otherwise produced during the course of discovery in this matter shall be contacted solely and exclusively through plaintiff's counsel Gorokhovsky Law Office LLC.

- B. A copy of, or description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

RESPONSE:

Any and all pertinent documents currently in Frontier's custody and control.

- C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.**

RESPONSE:

As direct and proximate cause of delayed departure of Frontier's flight 81 on December 19, 2016 the above-named Plaintiffs incurred out-of-pocket expenses for local food, meals water, refreshments, substituted clothing and international telecommunications in the sum not exceeding \$6,609.72 per passenger, including plaintiffs loss of wages claims.

- D. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

RESPONSE:

N/A

Dated on this 27th day of August 2017.

Respectfully submitted by:

GOROKHOVSKY LAW OFFICE, LLC
Attorney for Plaintiffs

BY: /s/ Vladimir M. Gorokhovsky
Vladimir M. Gorokhovsky, LL.M.
ILND TR.: 10994

P.O Business Address:

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(414)-581-1582

CERTIFICATE OF SERVICE

The undersigned attorney certifies that on August 28, 2017, he served the foregoing document by electronically filing the same with the Clerk of the U.S. District Court for the Northern District of Illinois by using the CM/ECF system, which will send notification of such filing to all CM/ECF participants.

/s/ Vladimir Gorokhovsky